

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA

*

v.

* **CASE NO. 2:18-cr-00178-DBH**

DERONG MIAO

*

DEFENDANT'S MOTION TO EXTEND

NOW COMES the Defendant, Derong Miao, by and through counsel, and moves the court to extend the deadline for filing motions. Limitations associated with COVID-19 including the recent Cumberland County Jail prohibition on attorney client visitation have delayed the ongoing plea negotiation process. However, discussions continue to advance. The government will not object to this motion

WHEREFORE, Defendant moves the Court to extend the deadline for filing motions to September 14, 2020.

Dated: August 14, 2020

Respectfully submitted by,

/s/Jeffrey W. Langholtz
Jeffrey W. Langholtz, Esq.
Bar No. 3539
Attorney for the Defendant

Certificate of Service

I hereby certify that on August 14, 2020 I electronically filed Defendant's Motion to Extend with the Clerk of Court using the CM/ECF system which will send notification of such filing(s) to the following: Assistant United States Attorney Darcie McElwee, and I hereby certify that on August 14, 2020, I have mailed by United States Postal Service, the document(s) to the following non-registered participants:

Derong Miao
Cumberland County Jail
50 County Way
Portland, ME 04102

/s/ Jeffrey W. Langholtz
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